



# PhytoPharmica<sup>®</sup>

NATURAL MEDICINES™

November 5, 2003

4504 DEC -1 2003 2:01

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by PhytoPharmica (a Division of Integrative Therapeutics, Inc.) at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. PhytoPharmica wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

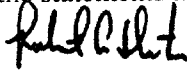
PRODUCT NAME	STATEMENTS	
Clinical Nutrients™ for Women	With the Easy Answers Stage 1 you know you're getting a solid nutritional foundation, supporting your bone health and balancing your hormone cycles naturally.*	Vitamin A, Vitamin C, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Calcium, Iron, Phosphorus, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Potassium, Choline Bitartrate, Black Tea Leaf Extract, Sour Cherry Fruit Extract, Green Tea Leaf Extract, Inositol, Ginger Rhizome Extract, Cranberry Fruit Extract, Chaste Tree Berry Extract, Grape Seed Extract, Bilberry Fruit Extract, Boron, Lutein, Silicon, Vanadium, Zeaxanthin

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.



By: \_\_\_\_\_

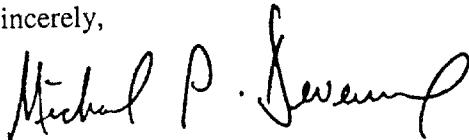
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11/5/03

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs, at (920) 406-3608.

Sincerely,



Michael P. Devereux  
Chief Financial Officer



November 6, 2003

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

RE: Label Claims/Disclaimers

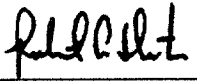
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PRODUCT NAME	STATEMENTS	
Clinical Nutrients™ for Women	With the Easy Answers Stage 2 can cover all your nutritional bases, support bone health and find relief from symptoms of perimenopause.*	Vitamin A, Vitamin C, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Calcium, Iron, Phosphorus, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Potassium, Choline Bitartrate, Black Tea Leaf Extract, Sour Cherry Fruit Extract, Green Tea Leaf Extract, Inositol, Ginger Rhizome Extract, Cranberry Fruit Extract, Chaste Tree Berry Extract, Grape Seed Extract, Bilberry Fruit Extract, Boron, Lutein, Silicon, Vanadium, Zeaxanthin

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WWW.PHYTOPHARMICA.COM

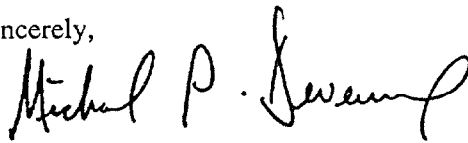
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By:   
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 11/6/03

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Michael P. Devereux  
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